

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WORCESTER DIVISION

FILED
IN CLERK'S OFFICE
2005 DEC 27 PM 4:04

SANDRA S. KATZ,
Plaintiff

V.

MATTHEW DENN, INSURANCE
COMMISSIONER OF THE STATE OF
DELAWARE, AS RECEIVER OF
NATIONAL HERITAGE LIFE INSURANCE
COMPANY IN LIQUIDATION,
Defendant and Third-Party Plaintiff,

V.

FEDERAL DEPOSIT INSURANCE
CORPORATION, UNITED STATES OF
AMERICA, E. PERRY KING, ALAN
MASON d/b/a ALAN MASON LEGAL
SERVICES, P.C. d/b/a ALAN MASON
LEGAL SERVICES, INC., ALAN MASON
LEGAL SERVICES, P.C., ALAN MASON
LEGAL SERVICES, INC., and ALAN
MASON LEGAL SERVICES, P.C. d/b/a
ALAN MASON LEGAL SERVICES, INC.,
Third-Party Defendants,

V.

E. PERRY KING and MANSOUR GAVAL,
Fourth-Party Defendants.

DOCKET NO. 05-CV-40014-FDS

AFFIDAVIT OF SANDRA S. KATZ

I, Sandra S. Katz, state and depose as follows:

- 1) I am the plaintiff in the above-referenced action.

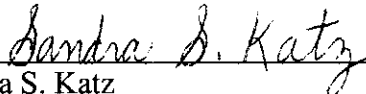
2) I purchased the property in question, 19 Canton Street in Worcester, Massachusetts (the "Property") from Mansour and Nader Gaval (the "Gavals") on or about December 19, 2003, for \$210,000 in an arms-length transaction (the "Purchase").

3) As a result of a title search of the Property performed prior to the Purchase, I was not aware of any issues with the title to the Property. It was my understanding that I was receiving a clear title to the Property at the time of the Purchase.

4) Neither at the time of the Purchase, nor at any time previous thereto, was I ever aware that a mortgage recorded against the Property had purportedly been assigned by the FDIC, nor did I have any knowledge that might lead me to believe that the FDIC did not have the authority to discharge said mortgage, nor did I have any knowledge that might lead me to believe that said mortgage was still valid against the Property.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY,

Dated: December 15, 2005


Sandra S. Katz